

EXHIBIT 9

From: [Droze, William M.](#)
To: [Gary Davis](#)
Cc: [Stacy Snow](#); [Jeff Friedman](#); [Andy Davis](#); [Lee Patterson](#); [West, Kadeisha A.](#); [Bailey, Matt](#)
Subject: RE: Parris v. Mount Vernon Mills, et al.
Date: Wednesday, November 9, 2022 11:39:58 AM
Attachments: [image001.png](#)

Gary: we have had the opportunity to discuss this dispute further with our Client following the meet and confer. Without waiver of our position expressed earlier, but in a good faith effort to resolve this dispute, Mount Vernon would be agreeable to producing a chart that shows manufacturer/chemical/use date going back to 1999 (the best available information), along with those MSDS/SDS disclosures that Mount Vernon has been able to locate for those chemicals shown on the chart. We discussed on the call that the spreadsheet approach was something that was used relative to the carpet manufacturers in other litigation.

We believe this proposal adequately addresses the concerns you expressed on the call, namely identifying chemical suppliers to Mount Vernon and the time frames, and the information those manufacturers shared with them about the composition of those chemicals. Similarly, it avoids the need for Mount Vernon to incur substantial review costs for documents that we believe are neither relevant nor proportional to the needs of the case. We ask that you give serious consideration to this compromise proposal and look forward to hearing from you. Best, W

William M. Droze

Partner

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From: Droze, William M.

Sent: Monday, November 7, 2022 5:12 PM

To: 'Gary Davis' <gadavis@enviroattorney.com>

Cc: Stacy Snow <ssnow@enviroattorney.com>; Jeff Friedman <jfriedman@friedman-lawyers.com>; Andy Davis <adavis@brinson-askew.com>; Lee Patterson <lpatterson@friedman-lawyers.com>; West, Kadeisha A. <Kadeisha.West@troutman.com>; Bailey, Matt <matt.bailey@troutman.com>

Subject: RE: Parris v. Mount Vernon Mills, et al.

Gary: thanks for your email. I had understood your proposal to be more limited and to focus on materials suppliers identities and sales and MSDS/SDS documents prior to 2016. As I explained, a 1992 time frame coupled with "all documents" and "all communications" requests is problematic. We will get back with you with our position. Thank you for your time today. Best, W

William M. Droze

Partner

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